

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

BRYAN CONKLING,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civ. 14-0234-WJ/KBM
	)	
TRI-STATE CAREFLIGHT, LLC, and	)	
BLAKE STAMPER, Individually,	)	
	)	
Defendants.	)	
_____	)	

**PLAINTIFF’S UNOPPOSED MOTION TO EXTEND DEADLINE FOR  
SUBSTITUTION OF PARTIES**

COMES NOW counsel for Bryan Conkling, Deceased, JONES, SNEAD, WERTHEIM & CLIFFORD, P.A., and respectfully moves this Court to extend the deadline for substituting the Plaintiff in this matter. As grounds therefore, counsel states as follows:

1. As the Court is aware, Plaintiff Bryan Conkling was tragically killed in a fall in the Sandia Mountains earlier this year. Bryan Conkling’s body was found in the Sandias in the early morning of September 2, 2015.
2. Counsel will seek to have Mark Conkling appointed as Bryan Conkling’s personal representative with regard to the present matter. However, that process has been delayed because Mark Conkling has not yet received a death certificate from the authorities (the investigation apparently being still ongoing).
3. To allow additional time for receipt of the death certificate and appointment of Mark Conkling as personal representative, counsel requests that this court extend the deadline

for substitution of parties to ten days after counsel has received an Order appointing Mark Conkling as the Personal Representative of Bryan Conkling.

4. If further delay of the death certificate results in this deadline occurring more than sixty days from the date of entry of an Order extending this deadline, Counsel proposes to submit a status report to the Court explaining the delay.
5. Counsel for the Defendants has been contacted and does not oppose this Motion.

Respectfully Submitted,

JONES, SNEAD, WERTHEIM &  
CLIFFORD, P.A.

By: /s/ Samuel C. Wolf  
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**CERTIFICATE OF SERVICE**

It is hereby certified that on the 29<sup>th</sup> day of December, 2015, a true copy of the foregoing *Plaintiff's Unopposed Motion to Extend Deadline for Substitution of Parties* was emailed to Mr. Charles Vigil at [cvigil@rodey.com](mailto:cvigil@rodey.com) and Jeffery L. Lowry [jlowry@rodey.com](mailto:jlowry@rodey.com) and sent via the CM/ECF system.

/s/Samuel C. Wolf  
SAMUEL C. WOLF